

4449

Jeffrey H. Howard (*pro hac vice*)
Jerome A. Murphy (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-624-2500
Facsimile: 202-628-5116
Email: jhoward@crowell.com
jmurphy@crowell.com

Jason C. Murray (CA Bar No. 169806)
Joshua C. Stokes (CA Bar No. 220214)
CROWELL & MORING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Telephone: 213-622-4750
Facsimile: 213-622-2690
Email: jmurray@crowell.com
jstokes@crowell.com

Counsel for Plaintiff Motorola Mobility, Inc.
[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

Master Docket No. 07-m-1827 SI

This Document Relates To:

*Motorola Mobility, Inc. v. AU Optronics
Corporation, et al., C 09-5840 SI*

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING PARTIES'
TIME TO MOVE TO COMPEL AS
TO CERTAIN DISCOVERY**

1 The undersigned Defendants in the above captioned-action and Plaintiff Motorola
2 Mobility, Inc. ("Motorola") stipulate as follows:

3 WHEREAS various Defendants have served discovery on Motorola prior to October 31,
4 2011 seeking discovery of the basis for Motorola's contentions in its complaint regarding
5 Defendants' participation in a conspiracy to affect the price of LCDs, to which Motorola has
6 served responses and objections ("Contention Discovery"), and Defendants also served
7 discovery requests related to other subjects, to which Motorola has served responses and
8 objections;

9 WHEREAS the parties have been in negotiations regarding an extension of time for
10 Motorola to supplement certain responses to the previously served discovery and to update its
11 chart of conspiracy evidence it served on May 24, 2011 as "Attachment A" to its responses to
12 certain discovery requests;

13 WHEREAS Motorola may serve supplemental responses to discovery requests served by
14 any Defendant not joining this Stipulation and this Stipulation is without prejudice to (a)
15 Motorola's ability to do so; or (b) the positions of any party not joining this stipulation with
16 respect to any such supplemental responses;

17 NOW THEREFORE, the parties stipulate and agree as follows:

18 1. Motorola will serve an updated Attachment A to include any supplemental
19 responses to the Contention Discovery by January 30, 2012 and the undersigned Defendants
20 shall have until March 1, 2012 to file motions to compel with respect to any supplemented
21 responses; and

22 2. Motorola will serve any supplemental responses it intends to provide related to
23 subjects other than the Contention Discovery by January 20, 2012, and undersigned Defendants
24 shall have until February 10, 2012 to file motions to compel with respect to any supplemented
25 responses.

1 Dated: December 28, 2011

2
3 /s/ Joshua C. Stokes

4 Jason C. Murray (CA Bar No. 169806)
5 Joshua C. Stokes (CA Bar No. 220214)
6 CROWELL & MORING LLP
7 515 South Flower St., 40th Floor
8 Los Angeles, CA 90071
9 Telephone: 213-622-4750
10 Facsimile: 213-622-2690
11 Email: jmurray@crowell.com
12 jstokes@crowell.com

13 Jeffrey H. Howard (*pro hac vice*)
14 Jerome A. Murphy (*pro hac vice*)
15 CROWELL & MORING LLP
16 1001 Pennsylvania Avenue, N.W.
17 Washington, D.C. 20004
18 Telephone: 202-624-2500
19 Facsimile: 202-628-5116
20 Email: jhoward@crowell.com
21 jmurphy@crowell.com

22 Kenneth L. Adams (*pro hac vice*)
23 R. Bruce Holcomb (*pro hac vice*)
24 Christopher T. Leonardo (*pro hac vice*)
25 ADAMS HOLCOMB LLP
26 1875 Eye Street NW
27 Washington, DC 20006
28 Telephone: 202-580-8822
Facsimile: 202-580-8821
Email: adams@adamsholcomb.com
holcomb@adamsholcomb.com
leonardo@adamsholcomb.com

Counsel for Plaintiff Motorola Mobility, Inc.

21 Dated: December 28, 2011

22 By: /s/ Derek F. Foran

23 MORRISON & FOERSTER LLP
24 Melvin Goldman
25 Stephen P. Freccero
26 Derek F. Foran
27 425 Market Street
28 San Francisco, California 94105-2482
Tel: (415) 268-7000
Fax: (415) 268-7522

*Counsel for Defendants Epson Imaging
Devices Corporation and Epson
Electronics America, Inc.*

1 Dated: December 28, 2011

By: /s/ Carl L. Blumenstein

2 NOSSAMAN LLP
3 Christopher A. Nedeau, Esq.
4 Carl L. Blumenstein, Esq.
5 Allison M. Dibley, Esq.
6 James A. Nickovich, Esq.
7 50 California Street, 34th Floor
8 San Francisco, CA 94111
9 Tel: (415) 398-3600
10 Fax: (415) 398-2438

*Counsel for Defendants AU Optronics
Corporation and AU Optronics
Corporation America*

11 Dated: December 28, 2011

By: /s/ Harrison J. Frahn IV

12 SIMPSON THACHER
13 & BARTLETT LLP
14 Harrison J. Frahn IV, Esq. (SBN 206822)
15 Jason M. Bussey, Esq. (SBN 227185)
16 2550 Hanover Street
17 Palo Alto, CA 94304
18 Telephone: (650) 251-5000
19 Facsimile: (650) 251-5002
20 hfrahn@stblaw.com
21 jbussey@stblaw.com

*Counsel for Defendants Chi Mei
Corporation, Chimei Innolux Corporation,
CMO Japan Co., Ltd., Chi Mei
Optoelectronics USA Inc., Nexgen
Mediatech Inc., and Nexgen Mediatech
USA Inc.*

1 Dated: December 28, 2011

By: /s/ Ramona Emerson

2 K&L GATES LLP
3 Hugh F. Bangasser, Esq.
4 Ramona Emerson, Esq.
5 925 Fourth Avenue, Suite 2900
6 Seattle, WA 98104-1158
7 Tel: (206) 623-7580
8 Fax: (206) 623-7022

Counsel for Defendants Hannstar Display Corporation

8 Dated: December 28, 2011

By: /s/ Michael R. Lazerwitz

9 CLEARY GOTTlieb STEEN &
10 HAMILTON LLP
11 Michael R. Lazerwitz, Esq.
12 Lee F. Berger, Esq.
13 Kelsey W. Shannon, Esq.
14 2000 Pennsylvania Avenue N.W.
15 Washington, DC 20006
16 Tel: (202) 974-1500
17 Fax: (202) 974-1999

Counsel for Defendants LG Display America, Inc. and LG Display Co., Ltd.

16 Dated: December 28, 2011

By: /s/ Brendan P. Cullen

17 SULLIVAN & CROMWELL LLP
18 Garrard R. Beeney, Esq.
19 Theodore Edelman, Esq.
20 125 Broad Street
21 New York, NY 10004-2498
22 Tel: (212) 558-4000
23 Fax: (212) 558-3588

24 Brendan P. Cullen, Esq.
25 Shawn J Lichaa, Esq.
26 1870 Embarcadero Road
27 Palo Alto, CA 94303
28 Tel: (650)461-5600
Fax: (650) 461-5745

Counsel for Defendants Philips Electronics North America Corporation

1 Dated: December 28, 2011

By: /s/ Jeffrey Davidson

COVINGTON & BURLING LLP

Timothy C. Hester, Esq.

Robert D. Wick, Esq.

Derek Ludwin, Esq.

Jeffrey Davidson, Esq.

One Front Street

San Francisco, CA 94111

Tel: (415) 591-6000

Fax: (415) 591-6091

*Counsel for Defendants Samsung
Electronics Co., Ltd., Samsung
Semiconductor, Inc., and Samsung
Electronics America, Inc.*

2 Dated: December 28, 2011

By: /s/ Michael W. Scarborough

SHEPPARD MULLIN RICHTER &
HAMPTON LLP

Gary L. Halling

James L. McGinnis

Michael W. Scarborough

Mona Solouki

Tyler M. Cunningham

Four Embarcadero Center, 17th Floor

San Francisco, CA 94111-4106

Tel: (415) 434-9100

Fax: (415) 434-3947

*Counsel for Defendants Samsung SDI Co.,
Ltd. and Samsung SDI America, Inc.*

3 Dated: December 28, 2011

By: /s/ Alison A. Davis

DAVIS WRIGHT TREMAINE LLP

Allison A. Davis, Esq.

505 Montgomery Street, Suite 800

San Francisco, CA 94111

Tel: (415) 276-6500

Fax: (415) 276-6599

*Counsel for Defendants Sanyo Consumer
Electronics Co., Ltd.*

1 Dated: December 28, 2011

By: /s/ Colin West

2 BINGHAM MCCUTCHEN LLP
3 Colin West, Esq.
4 Three Embarcadero Center
5 San Francisco, CA 94111-4067
6 Tel: (415) 393-2000
7 Fax: (415) 393-2286

*Counsel for Defendants Sharp Corporation
and Sharp Electronics Corporation*

8 Dated: December 28, 2011

By: /s/ John H. Chung

9 WHITE & CASE LLP
10 Christopher M. Curran (*pro hac vice*)
11 John H. Chung (*pro hac vice*)
12 Martin M. Toto (*pro hac vice*)
13 Kristen J. McAhren (*pro hac vice*)
14 1155 Avenue of the Americas
15 New York, NY 10036
16 Tel: (212) 819-8200
17 Fax: (212) 354-8113

*Attorneys for Toshiba Corporation,
Toshiba Mobile Display Co., Ltd., Toshiba
America Electronic Components, Inc. and
Toshiba America Information Systems, Inc.*

18 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in
19 the filing of this document has been obtained from the other signatories.

20 /s/ Joshua C. Stokes

21 Joshua Stokes

22 IT IS SO ORDERED.

23
24 Dated: 1/4, 2011

25 

26 Hon. Susan Illston, United States District Judge